



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*86 Chambers Street
New York, New York 10007*

May 12, 2026

Via ECF

The Honorable Katharine H. Parker
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States of America v. Anthem, Inc.*, No. 20 Civ. 2593 (ALC) (KHP)

Dear Judge Parker:

This Office represents plaintiff the United States of America (the “Government”) in the above-referenced lawsuit. We write respectfully to request that the Court temporarily seal for thirty days, until June 12, 2026, the Government’s reply (“Reply”) in further support of its request to direct defendant Anthem, Inc. (“Anthem”), to produce Peter Haytaian, Anthem’s former Executive Vice President, for a deposition. Specifically, the Reply contains quotations from: (1) documents that Anthem and a third party have produced that are marked Confidential pursuant to the Stipulation and Amended Protective Order (the “Protective Order”); and (2) the deposition transcript of a former Anthem employee, Gray King, which has been marked Attorneys’ Eyes Only pursuant to the Protective Order. *See* ECF No. 485.

In light of the Court’s April 10, 2024, Order directing the parties to “make a specific showing that higher values justify” any redactions that are under seal (the “Sealing Order”), ECF No. 199, at 4, we also respectfully propose to apply the procedure set forth in the Court’s Sealing Order to the Government’s Reply, such that any motion to maintain the redacted information under seal must be filed by June 12, 2026.

Lastly, the Government respectfully seeks leave to file on the public docket a version of the Government’s Reply that redacts the information in question.

The Government notes that the Court recently granted similar requests for provisional sealing of the parties’ position statements in connection with this dispute. *See* ECF Nos. 491, 498. Anthem consents to the Government’s request.

We thank the Court for its attention to this matter.

Respectfully submitted,

JAY CLAYTON
United States Attorney

By: /s/ Adam Gitlin

PIERRE ARMAND
PETER ARONOFF
RACHAEL DOUD
HARRY FIDLER
ADAM GITLIN
CHARLES JACOB
DANA WALSH KUMAR
Assistant United States Attorneys
86 Chambers Street, 3rd Floor
New York, New York 10007

cc: Counsel of record (via ECF)